

SUPPRESSED

FILED

FEB - 5 2015

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 Plaintiff,)
)
 v.)
)
 RAMIZ ZIJAD HODZIC,)
 a/k/a Siki Ramiz Hodzic,)
)
 SEDINA UNKIC HODZIC,)
)
 NIHAD ROSIC,)
 a/k/a Yahya AbuAyesha Mudzahid,)
)
 MEDIHA MEDY SALKICEVIC,)
 a/k/a Medy Ummuluna,)
 a/k/a Bosna Mexico,)
)
 ARMIN HARCEVIC, and)
)
 JASMINKA RAMIC,)
)
 Defendants.

4:15CR00049 CDP/DDN

No.

INDICTMENT

The Grand Jury Charges:

At all times relevant and material to this Indictment:

Introduction

1. Abdullah Ramo Pazara, a/k/a Abdullah Ramo Mudzahid, a/k/a Abdullah Pazara, a/k/a Abdullah Al Amriki, was a Bosnian native who immigrated to the United States, became a naturalized citizen, and resided in St. Louis, Missouri, in the Eastern District of Missouri, before leaving the United States on or about May 28, 2013.

2. Defendants Ramiz Zjad Hodzic, a/k/a Siki Ramiz Hodzic (hereinafter referred to as "Siki Ramiz Hodzic") and Sedina Unkic Hodzic, husband and wife, were Bosnian natives who immigrated to the United States as refugees and resided in St. Louis, Missouri, in the Eastern District of Missouri.

3. Defendant Mediha Medy Salkicevic, a/k/a Medy Ummuluna, a/k/a Bosna Mexico was a Bosnian native who immigrated to the United States, became a naturalized citizen, and resided in Schiller Park, Illinois.

4. Defendant Armin Harcevic was a Bosnian native who immigrated to the United States, and is a lawful permanent resident who resided in St. Louis, Missouri, in the Eastern District of Missouri.

5. Defendant Jasminka Ramic was a Bosnian native who immigrated to the United States as a legal permanent resident, and resided in Rockford, Illinois.

6. Defendant Nihad Rosic, a/k/a Yahya AbuAyesha Mudzahid, was a Bosnian native who immigrated to the United States, became a naturalized citizen, and resided in Utica, New York.

7. Western Union was a business with headquarters in Englewood, Colorado, that operated as a licensed money transfer business with branches and services in the Eastern District of Missouri and elsewhere, including but not limited to Turkey, Bosnia and Herzegovina, and Saudi Arabia.

8. PayPal was a business with headquarters in San Jose, California and La Vista, Nebraska, that operated as a licensed, online e-commerce and money transfer business that provided services in the Eastern District of Missouri and elsewhere.

9. Facebook was a business with headquarters in Menlo Park, California, that operated an online social media website used by individuals around the world to include users in the Eastern District of Missouri.

10. There were individuals located in Turkey and Saudi Arabia who acted as a third party intermediaries who received materials, money, and property from conspirators in the United States and thereafter transferred the same to Abdullah Ramo Pazara and others in Syria, Iraq and elsewhere.

11. There were individuals located in Montenegro and Bosnia and Herzegovina, who had family members who fought, or were fighting, in Syria, Iraq and elsewhere and who received money from conspirators in the United States as support for their families.

12. There were individuals who were located in Serbia, Bosnia and Herzegovina, and Montenegro, who individually traveled to, and fought in, Syria, Iraq and elsewhere along with Abdullah Ramo Pazara and others with, and in support of: Al-Qa'ida in Iraq, Al-Nusrah Front, the Islamic State of Iraq and the Levant, and the Islamic State of Iraq and Syria, and who communicated with conspirators in the Eastern District of Missouri and elsewhere.

13. Al-Qa'ida in Iraq (hereinafter "AQI"), was a foreign terrorist organization (hereinafter "FTO") that, at various times, was also known by the following aliases: al-Nusrah Front (hereinafter "ANF"), Jabhat al-Nusrah, Jabhet al-Nusra, Islamic State of Iraq and the Levant (hereinafter "ISIL"), the Islamic State of Iraq and al-Sham, and the Islamic State of Iraq and Syria (hereinafter "ISIS") (hereinafter collectively referred to as "designated FTOs").

COUNT I
(CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO TERRORISTS)

The Grand Jury charges that:

A. The conspiracy

1. Paragraphs one (1) through thirteen (13) of the Introduction are hereby re-alleged and incorporated by reference as though fully set forth herein.
2. Beginning on a date unknown but no later than in May 2013, and continuing to the present with the exact dates being unknown, in the Eastern District of Missouri and elsewhere:

**RAMIZ ZIJAD HODZIC a/k/a SIKI RAMIZ HODZIC,
SEDINA UNKIC HODZIC,
NIHAD ROSIC, a/k/a YAHYA ABUAYESHA MUDZAHID,
MEDIHA MEDY SALKICEVIC, a/k/a MEDY UMMULUNA, a/k/a BOSNA MEXICO,
ARMIN HARCEVIC, and
JASMINKA RAMIC**

the defendants herein, and Abdullah Ramo Pazara, a/k/a Abdullah Ramo Mudzahid, a/k/a Abdullah Pazara, a/k/a Abdullah Al Amriki, named but not indicted, and other persons known and unknown to the Grand Jury, (hereinafter in Count I, collectively “the members of the conspiracy”), did knowingly and willfully combine, conspire, confederate and agree with each other, to provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including: currency and monetary instruments (collectively “money”), and property to include: United States military uniforms, combat boots, military surplus goods, tactical gear and clothing, firearms accessories, optical equipment and range finders, rifle scopes, and equipment, knowing and intending that such money and property were to be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 956(a), that is, a conspiracy to commit at places outside of the United States acts

that would constitute offenses and murder and maiming if committed in the special maritime and territorial jurisdiction of the United States, with one or more of the conspirators committing an act within the jurisdiction of the United States to effect the object of the conspiracy.

B. Manner and Means

3. In furtherance of the conspiracy, and to effect the illegal objects thereof, defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, Mediha Medy Salkicevic, Armin Harcevic, Jasmina Ramic, Nihad Rosic, as well as Abdullah Ramo Pazara, and other persons known and unknown to the Grand Jury, used the following manner and means, among others, to accomplish the conspiracy.

4. Abdullah Ramo Pazara and others persons known to the Grand Jury facilitated the conspiracy by travelling to Syria, Iraq, and elsewhere to support the designated FTOs and act as foreign fighters by participating in the ongoing conflict and otherwise engaging in acts of violence, to including killing and maiming persons.

5. Defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, Mediha Medy Salkicevic, Jasmina Ramic, and others known and unknown to the Grand Jury facilitated the conspiracy by seeking out and identifying supporters and other conspirators in the United States and elsewhere, soliciting money from said individuals, and coordinating the receipt of money intending the money to be transferred to, and used in support of, Abdullah Ramo Pazara, and others known and unknown to the Grand Jury, who were fighting in Syria, Iraq, and elsewhere in support of the designated FTOs.

6. Defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, Mediha Medy Salkicevic, Jasmina Ramic, Armin Harcevic, Nihad Rosic, and others known and unknown to the Grand Jury facilitated the conspiracy by contributing their personal money, intending the money to be

transferred to, and used in support of, Abdullah Ramo Pazara and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere in support of the designated FTOs.

7. Defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, facilitated the conspiracy by obtaining money from members of the conspiracy and thereafter using the money to, among other things, purchase materials and supplies including: United States military uniforms, tactical combat boots, military surplus goods, tactical gear and clothing, firearms accessories, optical equipment and range finders, rifle scopes, equipment, and supplies from businesses in the Eastern District of Missouri, intending that the materials and supplies would thereafter be transferred to, and used to support, Abdullah Ramo Pazara, and others who were fighting in Syria, Iraq, and elsewhere and in support of the designated FTOs.

8. Defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, and others known and unknown to the Grand Jury facilitated the conspiracy by shipping, or causing to be shipped, materials, supplies, and property that being: United States military uniforms, tactical combat boots, military surplus goods, tactical gear and clothing, firearms accessories, optical equipment and range finders, rifle scopes, equipment, and supplies from the Eastern District of Missouri, to third party intermediaries who subsequently transferred and provided the materials and supplies to Abdullah Ramo Pazara, and others known and unknown to the Grand Jury intending the materials to be used to support Abdullah Ramo Pazara and others who were fighting, in Syria, Iraq, and elsewhere and in support of the designated FTOs.

9. Defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, and others known and unknown to the Grand Jury facilitated the conspiracy by transferring, or causing to be transferred materials and property, that being money, through money remitting businesses located in the

United States, including Western Union, to third party intermediaries who subsequently transferred and provided the money to Abdullah Ramo Pazara and others known and unknown to the Grand Jury intending it to be used to support Abdullah Ramo Pazara and others who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

10. Defendants Siki Ramiz Hodzic and Sedina Unkic Hodzic, facilitated the conspiracy by transferring money to other individuals in Bosnia and Herzegovina, and Montenegro, as support to the families of individuals who fought, and were fighting, in Syria, Iraq, and elsewhere and in support of the designated FTOs.

11. During the time period of the conspiracy, defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, Mediha Medy Salkicevic, Armin Harcevic, Jasminka Ramic, and Nihad Rosic, knew that Abdullah Ramo Pazara and others known and unknown to the Grand Jury were fighting in Syria, Iraq and elsewhere and that said individuals received materials, money, and supplies provided by the defendants while Abdullah Ramo Pazara and others were engaged in violent activities overseas, including conspiring to murder and maim persons, and further knew and intended that the materials, money, supplies, and property that were provided to said Abdullah Ramo Pazara and others known and unknown would be used to support said individuals who were fighting with, and in support of the designated FTOs.

12. In order to avoid detection and further the goals of the conspiracy, members of the conspiracy used telephones and online social media websites such as Facebook to send and receive messages; share or post “updates;” post “likes” and “comments;” send and receive photographs and videos; have private conversations; and otherwise communicate with members of the conspiracy.

13. During the time period of the conspiracy, defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, Mediha Medy Salkicevic, Armin Harcevic, Jasminka Ramic, and Nihad Rosic, and Abdullah Ramo Pazara and others known and unknown used Facebook, telephones, electronic mail, and other means to: post videos, images, and messages concerning the designated FTOs; update members of the conspiracy concerning the status of Abdullah Ramo Pazara and other foreign fighters who were supporting the designated FTOs; coordinate the transfer of money, materials, and property to individuals who were supporting the designated FTOs; encourage support for Abdullah Ramo Pazara and other foreign fighters who were in Syria, Iraq and elsewhere; update one another on the activities of the designated FTOs; discuss travel plans for individuals who desired to travel to Syria and support Abdullah Ramo Pazara, and others known and unknown, who were supporting the designated FTOs; and to discuss weapons, tactics, and the violent activities of Abdullah Ramo Pazara, and others known and unknown, and who supported the designated FTOs.

14. In order to avoid detection and further the goals of the conspiracy, members of the conspiracy used coded language to: (a) refer to persons and groups of individuals, including but not limited to: the “Brothers,” “Lions,” “Bosnian Brothers,” “mujahids,” “kufars,” “infidels,” and “Shaheed” among other terms; (b) plan the means by which they could provide support to persons who were affiliated with and supporting the designated FTOs; (c) refer to places in Syria and Iraq; including but not limited to: “the beach,” and, (d) refer to weapons, ammunition, explosives, training, fighting, and violent activities of the designated FTOs, such as “actions,” “dawa,” “dalwa,” and “IDIS” among other terms and topics.

15. In order to avoid detection and further the goals of the conspiracy, members of the conspiracy sometimes used nicknames, fictitious names, names of third persons, and alias titles when referring to members of the conspiracy.

16. Beginning on or about May 28, 2013, Abdullah Ramo Pazara traveled from St. Louis, Missouri, to Zagreb, Croatia, Bosnia and Herzegovina, and ultimately to Syria, where he arrived in July 2013, to support the designated FTOs by acting as a foreign fighter and otherwise engaging in acts of violence and property destruction in Syria, Iraq, and elsewhere and in support of the designated FTOs.

17. From on or about August 2013, through September 2013, defendants Siki Ramiz Hodzic, Mediha Medy Salkicevic, Jasminka Ramic, Armin Harcevic and others known and unknown to the Grand Jury, collected money from third parties, as well as contributed their own personal money, and thereafter transferred, or caused to be transferred, the money to defendant Siki Ramiz Hodzic in St. Louis, Missouri, through PayPal and Western Union among other means.

18. From on or about August 10, 2013, to on or about August 12, 2013, defendant Mediha Medy Salkicevic transferred, or caused to be transferred, \$1,500.00 in United States currency via PayPal to defendant Siki Ramiz Hodzic.

19. On or about August 17, 2013, \$1,000.00, and \$495.00 in United States currency was transferred from a PayPal account used by defendant Siki Ramiz Hodzic to a financial account used by defendant Siki Ramiz Hodzic with the transfers being posted and received on about August 19, 2013.

20. From on or about August 12, through August 19, 2013, defendant Siki Ramiz Hodzic purchased approximately \$538.00 in United States military uniforms, tactical clothing

and gear, combat boots, and military surplus supplies and items from businesses in St. Louis, Missouri.

21. On or about August 23, 2013, defendant Siki Ramiz Hodzic shipped, or caused to be shipped, three boxes via the United States Postal Service containing: United States military uniforms, tactical clothing and gear, combat boots, and military surplus items to a third party intermediary in Istanbul, Turkey, with said boxes being received in Turkey on or about September 25, 2013, and thereafter transferred and provided to Abdullah Ramo Pazara and others in who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

22. On or about September 20, 2013, defendant Jasmina Ramic transferred, or caused to be transferred, \$300.00 in United States currency via Western Union to defendant Siki Ramiz Hodzic in St. Louis, Missouri, with the money being received on or about September 23, 2013.

23. On or about September 24, 2013, defendant Armin Harcevic transferred, or caused to be transferred \$1,500.00 in United States currency via a wire transfer from a financial account used by Armin Harcevic to a financial account used by defendant Siki Ramiz Hodzic.

24. From on or about September 17, 2013, to on or about September 25, 2013, defendant Siki Ramiz Hodzic transferred, or caused to be transferred, \$1,850.00 in United States currency via Western Union to a third party intermediary in Istanbul, Turkey, with the money being transferred and provided to Abdullah Ramo Pazara and others who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

25. From on or about October 16, 2013, to on or about September 25, 2014, defendants Sedina Hodzic and defendant Siki Ramiz Hodzic transferred, or caused to be transferred, \$1,100.00 in United States currency via Western Union to a third party.

26. From in or about October 2013, through November 2013, defendants Siki Ramiz Hodzic, Sedina Unkic Hodzic, Mediha Medy Salkicevic, and Jasminka Ramic collected money from third parties, as well as contributed their own personal money, and thereafter transferred, or caused to be transferred, the money to defendant Siki Ramiz Hodzic in St. Louis, Missouri, through PayPal and Western Union among other means.

27. From on or about October 6, 2013, to on or about October 10, 2013, defendant Mediha Medy Salkicevic, transferred, or caused to be transferred \$1,200.00 in United States currency via PayPal to a financial account used by defendant Siki Ramiz Hodzic.

28. On or about October 15, 2013, \$1,200.00 in United States currency was transferred from a PayPal account used by defendant Siki Ramiz Hodzic to a financial account used by defendant Siki Ramiz Hodzic.

29. From on or about October 16, 2013, through October 19, 2013, defendant Siki Ramiz Hodzic purchased approximately \$1,913.54 in materials and supplies including: United States military uniforms, combat boots, tactical clothing and gear, military surplus goods, firearms accessories, rifle scopes, optical equipment and range finders, and other equipment from businesses in St. Louis Missouri.

30. On or about October 19, 2013, defendant Siki Ramiz Hodzic told Salkicevic that as soon as it (shipments) crossed the border he would send her pictures. He then sent Salkicevic a photograph depicting two long rifle scopes and told her that they go on a sniper rifle and Salkicevic replied that she hoped that they reach "them" and that they be put them to good use.

31. On or about October 28, 2013, defendant Sedina Unkic Hodzic shipped, or caused to be shipped, six boxes via the United State Postal Service containing United States military uniforms, combat boots, tactical clothing and gear, military surplus goods, firearms accessories,

rifle scopes, optical equipment and range finders, first aid supplies, and other equipment to a third party intermediary in Gaziantep, Turkey, with all of the boxes arriving in Turkey by November 2013.

32. On or about November 17, 2013, defendant Jasminka Ramic transferred, or caused to be transferred, \$250.00 in United States currency via Western Union to defendant Siki Ramiz Hodzic in St. Louis, Missouri, with the money being received on or about November 19, 2013.

33. On or about November 19, 2013, defendant Siki Ramiz Hodzic transferred, or caused to be transferred, \$1,700.00 in United States currency via Western Union to a third party intermediary in Gaziantep, Turkey, with the money being received on or about November 26, 2013, and thereafter transferred and provided to Abdullah Ramo Pazara, and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

34. In or about December 2013, defendant Siki Ramiz Hodzic collected money from others known and unknown to the Grand Jury, and thereafter from on or about December 21, 2013, to on or about December 25, 2013, defendant Siki Ramiz Hodzic transferred, or caused to be transferred, \$1,100.00 in United States currency via Western Union to a third party intermediary in Gaziantep, Turkey, and thereafter transferred and provided to Abdullah Ramo Pazara and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

35. On or about December 23, 2013, defendant Jasminka Ramic transferred, or caused to be transferred, \$150.00 in United States currency from Rockford, Illinois, via Western

Union, to defendant Siki Ramiz Hodzic in St. Louis, Missouri, with the money being received on or about December 24, 2013.

36. On or about January 4, 2014, defendant Mediha Medy Salkicevic transferred, or caused to be transferred, \$1,062.00 in United States currency via a PayPal to an account used by defendant Siki Ramiz Hodzic.

37. On or about January 21, 2013, \$1,000.00 in United States currency was transferred from a PayPal account used by defendant Siki Ramiz Hodzic to a financial account used by defendant Siki Ramiz Hodzic.

38. From in our about February through March 2014, defendant Siki Ramiz Hodzic collected money from others known and unknown to the Grand Jury, and thereafter on or about March 9, 2014, defendant Sedina Unkic Hodzic transferred, or caused to be transferred, \$450.00 in United States currency from St. Louis, Missouri via Western Union to a third party intermediary in Riyadh, Saudi Arabia, and thereafter being transferred and provided to Abdullah Ramo Pazara and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

39. On or about March 20, 2014, Abdullah Ramo Pazara told an individual known to the Grand Jury that he had just returned from a mission where they captured a large area, killed eleven individuals, captured one, and added that they intended to slaughter the prisoner the follow day. Abdullah Ramo Pazara added that most of a FTO which he identified had joined another FTO and they were making progress, with the Islamic State spreading every day.

40. On or about April 1, 2014, defendant Siki Ramiz Hodzic told defendant Nihad Rosic that five good snipers could do wonders there (Syria); that he watched a video of "ours" in trenches and in warfare; that "ours" downed five and slaughtered them; and, that he watched the

sharia punishment of a beheading. Defendant Siki Ramiz Hodzic added that he watched a video where Abdullah Ramo Pazara's group fought through 200 kilometers, captured trenches, checkpoints, and houses and then fled.

41. On or about April 15, 2014, defendant Nihad Rosic transferred, or caused to be transferred, \$500.00 in United States currency from Utica, New York, via Western Union to defendant Siki Ramiz Hodzic in St. Louis, Missouri.

42. On or about April 25, 2014, defendant Siki Ramiz Hodzic told defendant Nihad Rosic that if he went to Syria he did not need to buy uniforms, boots, belt, jacket, or shirts because defendant Siki Ramiz Hodzic had everything ready for defendant Nihad Rosic and added that he get a night vision optic with a built-in camera for \$540.00 and that when defendant Nihad Rosic killed a person, he could record it.

43. On or about May 20, 2014, defendant Siki Ramiz Hodzic transferred, or caused to be transferred, \$750.00 in United States currency from St. Louis, Missouri, via Western Union to a third party intermediary in Gaziantep, Turkey, intending that the money be transferred and provided to Abdullah Ramo Pazara and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

44. On or about June 14, 2014, to on or about September 20, 2014, defendant Ramiz Hodzic transferred, or caused to be transferred, \$900.00 in United States currency via Western Union to an individual in Zenica, Bosnia and Herzegovina intending the money to be used to support an individual who was fighting with Abdullah Ramo Pazara, and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

45. On or about July 20, 2014, defendant Nihad Rosic attempted to board Norwegian Airlines flight number DY7002 at J.F.K. International Airport intending to travel to Syria to join Abdullah Ramo Pazara and others known and unknown to the Grand Jury who were fighting in Syria, Iraq, and elsewhere and in support of the designated FTOs.

46. In or about August 2014, defendant Siki Ramiz Hodzic gave \$600.00 to an individual who transferred, or caused to be transferred, \$500.00 in United States currency via Western Union to an individual in Zenica, Bosnia and Herzegovina, intending that the money would be used by the individual to travel to Syria, transport supplies to, and join Abdullah Ramo Pazara, and others known and unknown to the Grand Jury, who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

47. On or about September 8, 2014, defendant Siki Ramiz Hodzic transferred, or caused to be transferred, \$250.00 in United States currency via Western Union to an individual Zenica, in Bosnia and Herzegovina, intending the money to be used by the individual to travel to Syria, transport supplies to, and join Abdullah Ramo Pazara and others known and unknown to the Grand Jury who were fighting in Syria, Iraq and elsewhere and in support of the designated FTOs.

48. On or about September 4, 2014, defendant Sedina Unkic Hodzic transferred, or caused to be transferred, \$250.00 in United States currency via Western Union to an individual in Teslic, Bosnia and Herzegovina intending the money to be used to support the individual who previously fought in Syria with Abdullah Ramo Pazara and others known and unknown to the Grand Jury and in support of the designated FTOs.

All in violation of, and punishable under, Title 18, United States Code, Section, 2339A.

COUNT II

(CONSPIRACY TO KILL OR MAIM PERSONS IN A FOREIGN COUNTRY)

The Grand Jury further charges that:

1. Paragraphs one (1) through thirteen (13) of the Introduction and paragraphs three (3) through forty-eight (48) of the Manner and Means of Count I of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. Beginning no later than in or about April 2013, and continuing through the present, with the exact dates being unknown, in the Eastern District of Missouri and elsewhere:

**RAMIZ ZIJAD HODZIC, a/k/a SIKI RAMIZ HODZIC, and
NIHAD ROSIC, a/k/a YAHYA ABUAYESHA MUDZAHID**

the defendants herein, and Abdullah Ramo Pazara, a/k/a Abdullah Ramo Mudzahid, a/k/a Abdullah Pazara, a/k/a Abdullah Al Amriki, named but not indicted, and other persons known and unknown to the Grand Jury, (hereinafter collectively “the members of the conspiracy”), did knowingly and willfully conspire, agree with each other, and with other persons known and unknown to the Grand Jury to commit one or more acts outside the United States that would constitute the offense of murder and maiming if committed in the special maritime and territorial jurisdiction of the United States, and one or more conspirators committed one or more acts within the jurisdiction of the United States to effect an object of the conspiracy.

3. In furtherance of the conspiracy and to effect the objects thereof, the defendants, together with others known and unknown to the Grand Jury committed and caused to be committed, among others one or more of the following acts:

4. Paragraphs three (3) through forty-eight (48) of the Manner and Means Section of Count I of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

All in violation of and punishable under Title 18, United States Code, Section, 956 and 2.

COUNT III

(PROVIDING MATERIAL SUPPORT TO TERRORISTS)

The Grand Jury further charges that:

1. Paragraphs one (1) through thirteen (13) of the Introduction and paragraphs three (3) through forty-eight (48) of the Manner and Means of Count I of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.
2. Beginning on a date unknown but no later than in May 2013, and continuing through the present, with the exact dates being unknown, in the Eastern District of Missouri and elsewhere:

**RAMIZ ZIJAD HODZIC, a/k/a SIKI RAMIZ HODZIC,
SEDINA UNKIC HODZIC,
NIHAD ROSIC, a/k/a YAHYA ABUAYESHA MUDZAHID,
MEDIHA MEDY SALKICEVIC, a/k/a MEDY UMMULUNA, a/k/a BOSNA MEXICO,
ARMIN HARCEVIC, and
JASMINKA RAMIC**

the defendants herein, and Abdullah Ramo Pazara, a/k/a Abdullah Ramo Mudzahid, a/k/a Abdullah Pazara, a/k/a Abdullah Al Amriki, named but not indicted, and other persons known and unknown to the Grand Jury, did knowingly and willfully provide, and attempt to provide, material supplies and resources, as defined in Title 18, United States Code, Section 2339A(b), to include: United States currency and monetary instruments (money) and property to include: United States military uniforms, combat boots, military surplus goods, tactical gear and clothing, firearms accessories, optical equipment and range finders, first aid supplies, rifle scopes, and equipment, knowing and intending that such support was to be used in preparation for, and in carrying out, a violation of Title 18, United States Code, Section 956(a), that is, a conspiracy to commit at places outside the United States acts that would constitute offenses of murder

ormaiming if committed in the special maritime and territorial jurisdiction of the United States, with one or more of the conspirators committing an act within the jurisdiction of the United States to effect the object of the conspiracy.

All in violation of and punishable under Title 18, United States Code, Section, 2339A.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

MATTHEW T. DRAKE
Assistant United States Attorney